

Gregory M. Fox, State Bar No. 070876
 BERTRAND, FOX & ELLIOT
 The Waterfront Building
 2749 Hyde Street
 San Francisco, California 94109
 Telephone: (415) 353-0999
 Facsimile: (415) 353-0990

Teresa L. Highsmith – State Bar No. 155262
 Office of the City Attorney
 2263 Santa Clara Avenue, Room 280
 Alameda, California 94501-4477
 Telephone: (510) 747-4750
 Facsimile: (510) 747-4767

Attorneys for Defendants
 CITY OF ALAMEDA POLICE DEPARTMENT.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

TSOGTBAYAR SANDAGDORJ, Plaintiff, vs. CITY OF ALAMEDA POLICE DEPARTMENT; OFFICER S. BRENNAN #512; OFFICER CRUZ #510; AND DOES 1- 100. Jointly and Severally, Defendants.) Case No.: C-06-4995 TEH)) STIPULATION AND [PROPOSED] ORDER) RESCHEDULING INITIAL CASE) MANAGEMENT CONFERENCE AND) ADR DEADLINES AND TIME FOR) FIRST RESPONSIVE PLEADING BY) DEFENDANT CITY OF ALAMEDA) POLICE DEPARTMENT)))
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The parties, acting by and through their respective attorneys, stipulate to the following rescheduling of the Initial Case Management Conference and ADR deadlines and the time for the first responsive pleading by the defendant City of Alameda Police Department. Good cause exists for this stipulation in that the defendant City of Alameda Police Department was not served until October 26, 2006. Defense counsel was first notified of the lawsuit November 3, 2006 and he was in trial until November 9, 2006 in the matter of Brown v City of Oakland C03 1141 TEH. The parties need time to meet and confer about the pleadings, the proper identification of individual officers that may be named as defendants or if presently named whether they should be dismissed at an early time in the proceedings. Defense counsel also needs time to review the file and disclose appropriate

documents to plaintiff and plaintiff needs time to do his initial disclosure to the defense.

New Case Management Conference Date: 1:30pm Monday, January 8, 2007
Courtroom 12, 19th Floor, SF

Defendant's First Responsive Pleading: On or before December 13, 2006.

Filing of Joint Case Management Statement: December 13, 2006

Completion of Initial Disclosures December 13, 2006

File ADR Certification December 13, 2006

File Either ADR Stipulation or Notice Need Phone Call December 13, 2006

So Stipulated:

Dated: November 16, 2006 By: /s/
Hume Joseph Jung

Dated: November 17, 2006 BERTRAND, FOX & ELLIOT

By: /s/
Gregory M. Fox
Attorneys for Defendants
ALAMEDA POLICE DEPT. and
OFFICERS EMMANUEL CRUZ and
S. BRENNAN

GOOD CAUSE APPEARING THE STIPULATION IS SO ORDERED

Dated: November 17, 2006

THELTON E. HENDERSON
UNITED STATES DISTRICT COURT

ATTORNEY ATTESTATION

I hereby attest that I have on file all holograph signatures for any
"conformed" signature (/s/) within this E-filed document.

Dated: November 17, 2006

/s/
Gregory M. Fox

